

PLANNING REF : 261171
PROPERTY ADDRESS : 51 Foxborough
: Swallowfield
: RG7 1RW
SUBMITTED BY : Mr Derek Paul Scuffell
DATE SUBMITTED : 14/06/2026

COMMENTS:

OBJECTION - Planning Application 261171 (PP/14925203)

Site: Land opposite Charlton Lane, Trowe's Lane, Swallowfield, RG7 1RN

Proposal: Change of use of land to a caravan site for 5 gypsy and traveller pitches.

I object to this application as a resident of Swallowfield, principally on flood risk and drainage grounds and on conflict with the adopted development plan and national policy.

1. Flood risk from all sources has not been properly assessed. The applicant's Flood Risk Assessment (FRA) dismisses the Sequential and Exception Tests solely because the site is in fluvial Flood Zone 1, yet the same FRA rates the site HIGH risk for surface water flooding and MEDIUM for groundwater. Adopted Policy CC09 requires the

sequential, risk-based approach to be applied to flooding from ALL sources, and to historic flooding. The change of use is to a more vulnerable (residential) use and is not exempt from the sequential test. The national Planning Policy for Traveller Sites (paragraph 13(g)) says sites should not be located in areas at high risk of flooding given the particular vulnerability of caravans, which the NPPF (Annex 3) classifies as "highly vulnerable."

2. The proposal conflicts with the parish's flood-resilience work. Swallowfield has a documented flood history (2007, 2021, 2024). The Swallowfield Flood Resilience Group, informed by two commissioned hydrological reports, has delivered schemes (including the Riseley Natural Flood Management scheme of 67 leaky barriers) specifically to slow the run-off reaching Swallowfield. Covering this greenfield site with caravans, hardstanding and parking, and discharging surface water to a watercourse draining to the Blackwater, works against that investment.

3. The FRA is deficient. It was prepared with no consultation with the Environment Agency, the Lead Local Flood Authority or Thames Water; it is internally contradictory on surface water; it provides no site-specific flood modelling; it is inconsistent on floor levels (1m in the body, 600mm in the conclusions); it rules out infiltration because of high groundwater (recorded at about 1.2m); it proposes discharge at 1.2 l/s, four times the 0.3 l/s the Lead Local Flood Authority requires; it has no discharge consent; and it wrongly states the site is in the "Wandle Catchment" when it drains to the Blackwater, in the Loddon catchment.

4. Foul drainage by cesspool. All foul sewage would be stored in a 50,000-litre cesspool emptied by tanker at least fortnightly, because a mains connection was deemed "not reasonable" and high groundwater rules out a septic-tank drainage field. Building

Regulations Approved Document H states that cesspools should be sited so as not to "be in an area where there is a risk of flooding." The cesspool's flotation risk in high groundwater is not assessed, and tanker access depends on lanes the FRA accepts are subject to flooding. As a resident I have witnessed Thames Water running tankers, at times around the clock, near Swallowfield village hall during peak floods because the network could not cope. The FRA itself records 181 sewer-flooding incidents in the RG7 1 area between 2000 and 2022.

5. Surface water and sustainable drainage. The proposed discharge (1.2 l/s) does not meet the greenfield restriction the LLFA requires (0.3 l/s), contrary to Policy CC10, and risks worsening flood risk elsewhere, contrary to Policy CC09.

6. Safe access and egress have not been demonstrated. The FRA relies on residents self-evacuating in their own 4x4 vehicles along rural lanes it accepts are subject to flooding, with no flood-warning registration.

7. Open countryside and greenfield land. The site is undeveloped agricultural land (the applicant's own description), not previously developed land. The Planning Policy for Traveller Sites (paragraph 26) says new traveller development in open countryside away from settlements should be very strictly limited, and (paragraph 27(a)) attaches weight to reusing previously developed land, which is the opposite of this proposal.

For these reasons the application conflicts with Core Strategy Policies CP1 and CP3, Managing Development Delivery Policies CC09 and CC10, the National Planning Policy Framework and the Planning Policy for Traveller Sites. I request that it be REFUSED, or at minimum that it not be determined until the Environment Agency, the Lead Local Flood Authority, Thames Water and the Council's environmental health officers have been consulted and a compliant Flood Risk Assessment and drainage strategy has been provided.

Derek Scuffell, 51 Foxborough, Swallowfield, RG7 1RW